

# Exhibit L

## Jared Goodman

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**From:** Patrick C. Greeley <PGreeley@kendrickslaw.com>  
**Sent:** Wednesday, July 25, 2018 8:27 AM  
**To:** Jared Goodman  
**Cc:** Brandon J. Evans; 'James P. Martin'; Martina Bernstein  
**Subject:** RE: DeYoung: Confidentiality Agreement  
**Attachments:** Redline (PCG Comments) (00364850-2xC6491).docx

Jared,

We have reviewed your comments and I have added comments into the Redline you provided addressing the issues you have raised.

I also want to notify you of an issue that has arisen. Our contact at the zoo, the person in charge of managing the Zoo and compliance with federal and state law, was admitted to her local hospital last Thursday and has been diagnosed with atypical pneumonia. The hospital believes there are other issues at play, but has been unable to diagnose those issues. She may be transferred to a different hospital, two hours away, for additional testing and care. I did speak with her briefly yesterday about the confidentiality agreement, but she is unable to string together more than a couple words without gasping for air.

While we can continue to work towards the confidentiality agreement, it will likely take more time to complete in light of the foregoing. To keep things moving, please forward the settlement agreement to the other parties that may receive documents or attend the deposition/inspection.

Thanks.  
Pat

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**From:** Patrick C. Greeley  
**Sent:** Tuesday, July 17, 2018 2:09 PM  
**To:** 'Jared Goodman'  
**Cc:** Brandon J. Evans; James P. Martin; Martina Bernstein  
**Subject:** RE: DeYoung: Confidentiality Agreement

Jared,

Thanks for sending the edits. I was traveling yesterday and catching up this morning. I will review promptly and get back to you.

Thanks.  
Pat

Patrick C. Greeley  
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**From:** Jared Goodman [mailto:JaredG@PetaF.org]  
**Sent:** Monday, July 16, 2018 9:47 PM  
**To:** Patrick C. Greeley  
**Cc:** Brandon J. Evans; James P. Martin; Martina Bernstein  
**Subject:** RE: DeYoung: Confidentiality Agreement

Pat,

I've attached our further edits to your proposed additions to the confidentiality and nondisclosure agreement. These are not comprehensive, but rather are intended to address the most substantial issues that Plaintiffs' would have with the additions. We don't believe it would be efficient or productive to discuss the finer details of the Agreement before we, and the other parties you've added to the Agreement, have reached an agreement with respect to these provisions.

Jared

Jared Goodman  
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**From:** Patrick C. Greeley <PGreeley@kendrickslaw.com>  
**Sent:** Tuesday, July 10, 2018 6:59 AM  
**To:** Jared Goodman <JaredG@PetaF.org>  
**Cc:** Brandon J. Evans <bevans@kendrickslaw.com>; James P. Martin <jmartin@polsinelli.com>; Martina Bernstein

<MartinaB@petaf.org>

**Subject:** RE: DeYoung: Confidentiality Agreement

Jared,

Unfortunately, the Zoo has been unable to obtain an expert. Further, my client is still working with the USDA to determine how to move forward with the inspection in a manner that does not violate USDA regulation.

As a result, the Zoo cannot move forward with the inspection on the 16<sup>th</sup>. As discussed, please provide new dates.

Attached please find the redlined NDA.

Thanks.

Pat

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**From:** Jared Goodman [<mailto:JaredG@PetaF.org>]  
**Sent:** Monday, July 09, 2018 10:33 PM  
**To:** Patrick C. Greeley  
**Cc:** Brandon J. Evans; James P. Martin; Martina Bernstein  
**Subject:** RE: DeYoung: Confidentiality Agreement

Pat,

Thank you. Do you have any update as to whether we can move forward with the inspection a week from today?

Jared

Jared Goodman  
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**From:** Patrick C. Greeley <[PGreeley@kendrickslaw.com](mailto:PGreeley@kendrickslaw.com)>

**Sent:** Monday, July 9, 2018 7:10 PM

**To:** Jared Goodman <[JaredG@PetaF.org](mailto:JaredG@PetaF.org)>

**Cc:** Brandon J. Evans <[bevans@kendrickslaw.com](mailto:bevans@kendrickslaw.com)>; James P. Martin <[jmartin@polsinelli.com](mailto:jmartin@polsinelli.com)>; Martina Bernstein <[MartinaB@petaf.org](mailto:MartinaB@petaf.org)>

**Subject:** Re: DeYoung: Confidentiality Agreement

Jared,

My client just sent me the Zoo's final revisions to the confidentiality agreement. I will make those revisions and forward to you first thing in the morning.

Thanks.

Pat

Sent from my iPhone

On Jul 1, 2018, at 1:01 PM, Jared Goodman <[JaredG@PetaF.org](mailto:JaredG@PetaF.org)> wrote:

Apologies. The file is attached here.

<MFP - NDA with DeYoung Family Zoo (00313663-3xB39F9).docx>

On Jul 1, 2018, at 9:55 AM, Jared Goodman <[JaredG@PetaF.org](mailto:JaredG@PetaF.org)> wrote:

Pat and Brandon,

Per your request, please find attached a draft confidentiality and nondisclosure agreement for your consideration.

This also confirms our discussion that on our conference on Tuesday, you will be providing a date certain for the production of documents and confirm your client's agreement that the site inspection of its facility will move forward on July 16 and deposition of its representative on July 23.

Thank you.

Jared

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